



Stacie
Peterson/R3/USEPA/US
04/03/2008 05:12 PM

To Michael Castor <easternplating@yahoo.com>
cc
bcc James Heenehan/R3/USEPA/US@EPA
Subject Re: Reference No. C08-009. EPA ID No. MDD063215453;
MD0000136366

Hello Mr. Castor. I have finished reviewing the response. Thank you for providing this information promptly. However, I have a number of additional questions. Rather than send you a formal follow-up information request, I thought I would send you my questions electronically. Please provide a response to my questions by Friday, April 18. If you have any further questions, please call me.

Furthermore, in follow-up to our telephone conversation of 3/25/08, any solid material generated by Eastern Plating's MEK distillation unit, along with any spent MEK-contaminated materials (brushes, q-tips, rags, gloves, etc.), would be classified as a F005 listed hazardous waste under RCRA Subtitle C. This determination is based on the information submitted to EPA by Eastern Plating on March 17, 2008 in response to a February 4, 2008 Information Request Letter. You stated that the Eastern Plating currently manages such solid materials as non-hazardous and disposes of it in the regular municipal trash. The management of this waste as non-hazardous must cease immediately and the solid material must be managed on-site in accordance with the generator requirements of 40 C.F.R. § 262.34. Furthermore, this waste must be shipped off-site for treatment and disposal to a RCRA Subtitle C permitted treatment, storage and disposal facility (TSDF).

Thanks.



Additional Questions for Eastern Plating.doc

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

Michael Castor <easternplating@yahoo.com>



Michael Castor
<easternplating@yahoo.com>
>
02/28/2008 05:51 PM

To Stacie Peterson/R3/USEPA/US@EPA
cc _Wellington Abhilashi <ep_labs@yahoo.com>, _Karen
<ep_pulaski2@yahoo.com>
Subject Reference No. C08-009. EPA ID No. MDD063215453;
MD0000136366

Hello Stacie -

We are requesting a two week extension to our responses for our case, as referenced above:

The original deadline, 30 days from the mailing date, was to be March 4. With the extension, we

would have the report submitted to you by March 18.

Our delay was due to several reasons:

The report was sent to Sarah Castor instead of me. It reached my desk several days after receipt.

We have sent samples to an independent lab for testing. We are still waiting for some of the results.

We will be waiting for your reply.

Thanks,

Mike Castor

Michael W. Castor

President

Eastern Plating Company, Inc.

410-342-4107

410-342-0105 fax

Looking for last minute shopping deals? [Find them fast with Yahoo! Search.](#)

Additional Questions for Eastern Plating

Pulaski Facility -

1. In the response to Question 2 of the February 4, 2008 Information Request, it is stated that approximately 1-2 drums (55-110 gallons) of MEK are accumulated per month from the Pulaski facility. In the response to Question 3 of the February 4, 2008 Information Request, it is stated that that within MEK storage, eight drums were observed: one drum (labeled "clean") was empty; one drum (labeled "clean") was full containing reclaimed MEK; four full drums contained "dirty" MEK awaiting recycling; and two partially full drums of MEK were used for more accumulation. Furthermore, it is stated that it is estimated that accumulation of these batches began in November 2007. Based on this information, it appeared that the Facility had approximately 2-4 more drums than expected during the December 2007 inspection.
 - a. If 1-2 drums of "dirty" MEK are generated per month at the Pulaski facility and the accumulation of the "dirty" MEK began in November 2007, please explain why four full drums and two partially filled drums of "dirty" MEK were observed during the December 11, 2007 inspection, and provide the basis of your knowledge.
 - b. How many gallons of "dirty" MEK are routinely generated in one month?
 - c. From November 2007 – December 11, 2007 (date of inspection) were 4-5 drums of "dirty" MEK generated? If so, please explain why it is stated in the response that approximately 1-2 drums are accumulated per month, and this was not the case from November 2007 – December 11, 2007.
2. In the response to Question 4 of the February 4, 2008 Information Request, it is stated that the dried still bottoms have been disposed in the municipal trash. Please provide an estimate, in pounds, of the amount of still bottoms that have been disposed in the municipal trash since the distillation unit began operating in March 2007, and the date(s) such disposal occurred.
3. On several of the Pulaski facility manifests, the generator identification number is listed as MDD981111750. This number is associated with Technical Finishers of 1817C Whitehead Road, Baltimore, Maryland. Eastern Plating's generator identification number is MD0000136366. Please explain why the generator identification number associated with Technical Finishers is on several of Eastern Plating's Pulaski facility manifests.
4. Several of the manifests provided for the Pulaski facility included the waste streams of n-propyl bromide, 2-propanol and nickel acetate, nickel hydroxide. For each of these two waste streams, please answer the following:

- a. Provide a detailed description of the process(es) that generate *each* of these waste streams.
- b. Please provide the chemical component names and the percentage of each chemical component present in *each* of these waste streams.
- c. Provide the Material Safety Data Sheets (MSDSs) for each chemical component present in *each* of these waste streams.
- d. State whether a “waste determination” and “LDR determination” was made for *each* of these waste streams.
- e. If a “waste determination” and “LDR determination” were made for each of these waste streams, state when *each* such determinations were made.
- f. Were *each* of these waste streams determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with *each* such hazardous waste.
- g. State whether *each* hazardous waste determination was based on the generator’s knowledge of the process that generated the waste or on analytical results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.

Baylis Facility –

5. In the response to Question 8 of the February 4, 2008 Information Request, it is stated that all aerosol cans are maintained and disposed of according to instructions given on the respective labels.
 - a. Please state how aerosol cans are disposed (e.g., thrown in the municipal waste).
 - b. For *each* aerosol can product used at the Facility, please provide a copy of *each* label which provides disposal instructions.
6. In the response to Question 18 of the February 4, 2008 Information Request, it is stated that waste materials were transported only one time during the week of November 12, 2007 from the Baylis facility to the Pulaski facility. The waste transported was one 55-gallon drum of “dirty” MEK. Based on a review of the manifests and LDRs for the Baylis facility, MEK was last shipped off-site to a disposal facility on September 26, 2006. 110 gallons to 330 gallons of “dirty”

MEK were shipped off-site from the Baylis facility approximately every three months from July 2003 – September 2006.

- a. Provide the basis of your knowledge in that only one shipment of one “dirty” MEK drum was transported from the Baylis facility to the Pulaski facility.
 - b. Please state how much “dirty” MEK was generated per month from September 2006 – March 2008, and provide any supporting documentation.
 - c. Please state how the “dirty” MEK generated from September 2006 – March 2008 was disposed, and provide any supporting documentation (e.g., manifests).
7. Based on a review of the manifests and LDRs for the Baylis facility, from July 2003 – September 2006, 110 gallons to 330 gallons of “dirty” MEK were shipped off-site from the Baylis facility approximately every three months. It is EPA’s understanding that this would equate to a generation rate of 36 gallons per month – 110 gallons per month of “dirty” MEK. In the response to Question 10 of the February 4, 2008 Information Request, it is stated that approximately 5-10 gallons of “dirty” MEK is generated per month.
 - a. Please provide the basis of your knowledge in that only 5-10 gallons of “dirty” MEK is generated per month.
 - b. Explain why the manifests indicate a greater monthly generation rate of MEK than what was provided in the response to Question 10 of the February 4, 2008 Information Request.
8. As documented in the December 11, 2007 inspection report, next to the electric meters and anodizing tank, ten (10) 55-gallon drums and one (1) overpack container were observed. Therefore, a total of eleven (11) containers were observed. A diagram of the layout of this area and the eleven containers was included in Attachment 2, which was included in the February 4, 2008 Information Request. Within Question 9 of the February 4, 2008 Information Request, additional information was requested for these eleven containers. However, in the response to Question 9 of the February 4, 2008 Information Request, only ten containers were identified and discussed. Please identify the remaining container and answer Question 9 for this container.
9. As documented in the December 11, 2007 inspection report, near the electric meters and anodizing tank, the inspector observed three drums labeled “Chromic Rinse,” “Chromic,” and “Rinse Chromic.” Although the inspectors were unable to observe any labels, Mr. Wellington Abhilashi, Facility chemist, stated that an additional container in this area (which had a cooler on top of it) also contained

chromic rinse water. Due to the limited spacing and the location of the drums, Mr. Abhilashi was unable to identify the contents of two remaining drums. However, in a January 17, 2007 letter from Mr. Abhilashi, one of these two drums was identified in this area as chromic rinse water and was labeled "Chromic Rinse." Of these five containers said to contain chromic rinse, two (2) were dated 12/7/07, one (1) was dated 10/30/07, and one (1) was dated 11/11/07. In the response to Question 9 of the February 4, 2008 Information Request, it is stated that three of the four chromic rinse water drums were generated on December 7, 2007.

- a. As explained in this question, it is EPA's understanding that there were five, not four, containers of chromic rinse water. Please state whether or not the above understanding is correct. If one or more of the above statements is not accurate, for each such statement please: a) indicate which statement(s) is inaccurate; b) describe, in detail, your reasons as to why such statement is inaccurate, and c) provide documentation supporting any assertion of inaccuracy.
 - b. Please provide the basis of your knowledge in that the chromic rinse water was generated on December 7, 2007.
 - c. Explain why two of the chromic rinse containers were dated 10/30/07 and 11/11/07, but were said to be generated on December 7, 2007 in the response.
 - d. Please state when the contents of the remaining chromic rinse water drum were generated and were disposed.
10. As documented in the December 11, 2007 inspection report, near the electric meters and anodizing tank, the inspector observed one overpack container labeled "Caustic Etch Sludge" and was dated 5/12/06. Due to the limited spacing and the location of the drums, Mr. Abhilashi was unable to identify the contents of two remaining drums in that area. However, in a January 17, 2007 letter from Mr. Abhilashi, one of these two drums was identified in this area as caustic etch sludge and was labeled "Etch Caustic" and undated. In the response to Question 9 of the February 4, 2008 Information Request, it is stated that the caustic etch drums were generated on June 20, 2007 and were used in the wastewater treatment system.
- a. Please provide the basis of your knowledge in that the caustic etch was generated on June 20, 2007.
 - b. Explain why one of the caustic etch containers was dated 5/12/06, but were said to be generated on June 20, 2007 in the response.

- c. Please provide the date and any supporting documentation as to when the caustic etch was used in the wastewater treatment system.
11. Of the manifests provided in the response to the February 4, 2008 Information Request, one was illegible. Please provide legible copies of manifest MDC0989360, which appears to be signed by Mr. Melvin Pollard on 1/14/03.
12. Several of the manifests provided for the Baylis facility included the waste stream nickel acetate, nickel hydroxide. For this waste streams, please answer the following:
- a. Provide a detailed description of the process(es) that generate this waste stream.
 - b. Please provide the chemical component names and the percentage of each chemical component present in this waste streams.
 - c. Provide the Material Safety Data Sheets (MSDSs) for each chemical component present in this waste stream.
 - d. State whether a “waste determination” and “LDR determination” was made for this waste stream.
 - f. If a “waste determination” and “LDR determination” were made for this waste stream, state when each such determination was made.
 - f. Was this waste streams determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
 - g. State whether the hazardous waste determination was based on the generator’s knowledge of the process that generated the waste or on analytical results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.

Both Facilities –

13. In the response to Question 21 of the February 4, 2008 Information Request, it is stated that contingency plans for each of Eastern Plating’s two facilities have been submitted to police departments, fire departments, hospitals, and state and local emergency response teams. Please state when these plans have been submitted to the police departments, fire departments, hospitals, and state and local emergency response teams, and provide the basis of your knowledge.

14. In the response to Question 20 of the February 4, 2008 Information Request, it is stated that Attachment 20a contains the job title and job description for the chemist. Attachment 20a was not included in the response. Please provide Attachment 20a.
15. There were a number of individual that signed manifests from 2003 – 2007 on behalf of Eastern Plating, including Gerald Sullivan, Karen Keffer, Espinoza, Michael Shimmer, Amy McGee, Justin Wright, Amy Writt, Brandon Humphreys, Stanley Howell, Karen Keffer, Frank Leach, and Rolanda Morris. Please state if job titles and job descriptions are maintained for these individuals. If so, please submit job titles and job descriptions for these employees, and state when such documentation was prepared.
16. In the response to Question 22 of the February 4, 2008 Information Request, it is stated that inspections of the hazardous waste storage area were performed weekly at both facilities by the Facility Chemists, however, no inspection logs have been maintained prior to June 2007. In a January 17, 2007 letter from Mr. Abhilashi, monthly inspection logs were provided for June 2007 – January 2008.
 - a. Since no inspection logs have been maintained prior to June 2007, and, thereafter, only monthly inspection logs have been maintained, please provide the basis of your knowledge that weekly inspections of the hazardous waste storage area were being performed.
 - b. For each Facility, please provide the name(s) of those employees responsible for conducting the weekly inspections of the hazardous waste storage areas.

April 28, 2008

Ms. Stacie L. Peterson (3WC31)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Responses to Additional Questions for
Information Request – Reference No. C08-009
EPA ID No. MDD063215453; MD0000136366

Dear Ms. Peterson:

Enclosed please find our Responses to the Additional Questions email sent to me on April 3, 2008.

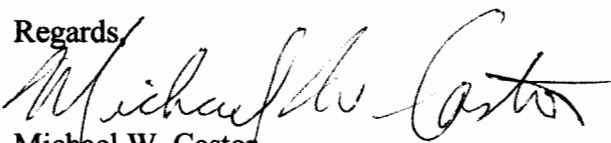
When preparing these responses I realized that several of our original responses were inaccurate, lacked detail or conflicted with other responses. When determining why this happened, I realized that I had not fully validated, cross-referenced or reconciled the responses. This includes those responses prepared for me or those responses which I prepared.

I prepared each of the enclosed responses. I validated each response with multiple interviews of current and former employees, documentation reviews and testing. Where necessary, I cross-referenced each of these sources. In the responses I included the documentation and supporting calculations which display how the response was determined. I also included explanations as to why the original responses were questionable.

There were several instances in the responses where I indicated the prior information given to me was incorrect. By no means is that an indictment on my part that someone else is to blame for inaccurate information. I take full responsibility, and the ramifications which go with it, for any inaccuracies in this or the prior set of responses. I've elected to include the testimonial, though it was not requested or may not be needed in this response, as a confirmation of my intent to provide the most accurate and thorough responses.

I am available at the contact information above for all follow up correspondence on these matters.

Regards,


Michael W. Castor
President

April 28, 2008

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.



Michael W. Castor
President



Michael Castor
<easternplating@yahoo.com>

04/28/2008 11:07 AM

To Stacie Peterson/R3/USEPA/US@EPA

cc

bcc

Subject Reference No. C08-009. EPA ID No. MDD063215453;
MD0000136366 -- Response #11

Hello Stacie -

Additional Question 11 requests a more legible copy of our manifest from 01/14/03.

We made a copy which is still not too legible in certain areas. This copy will be included in today's shipment.

Attached is a pdf which is more legible and shows all of the information.

Thanks,

Mike Castor

Peterson.Stacie@epamail.epa.gov wrote:

Hello Mike. That is fine - Please just FedEx them today. No need to have a driver deliver them.

Thanks for the update.

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

Michael Castor
yahoo.com> To
Stacie Peterson/R3/USEPA/US@EPA
04/25/2008 02:17 cc
PM
Subject
Re: Reference No. C08-009. EPA ID
No. MDD063215453; MD0000136366 --
Correction

MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway Baltimore, Maryland 21224
(410) 631-3344 1-800-633-6101 (within Maryland) http://www.mde.state.md.us
HAZARDOUS WASTE PROGRAM
HAZARDOUS WASTE MANIFEST

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039.

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the MDE at (410) 631-3400. Nights and Holidays at (410) 974-3551.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MD06321543		Manifest Document No. 33260		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.																			
3. Generator's Name and Mailing Address Eastern Plating Company 1200 South Baylis Street Baltimore, MD 21224																											
4. Generator's Phone (410) 342-1107																											
5. Transporter 1 Company Name Lowest Environmental Transport, Inc.																											
6. US EPA ID Number 0000000053																											
7. Transporter 2 Company Name						8. US EPA ID Number																					
9. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232						10. US EPA ID Number 0000000077010																					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol																	
a. Waste Methyl Ethyl Ketone; 3; UN1193; POI; (0001, 0035, 0005)						20M		110G																			
b. Waste Chronic Acid Solutions; 3; UN1755; POI; (0007, 0002)						80F		440G																			
c. Waste Corrosive Liquid, Aqueous; 8; UN1791; POI; (0001, 0007)																											
d. Waste Corrosive Solid, Aqueous; (Nickel Acetate, Nickel Hydroxide); 9; UN3077; POI						10F		100P																			
J. Additional Descriptions for Materials Listed Above <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>Haz. Code</th> <th>Physical State</th> <th>Specific Gravity</th> <th>Percentage</th> <th>Haz. Code</th> <th>Physical State</th> <th>Specific Gravity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td colspan="8"> 1. Waste Methyl Ethyl Ketone; 3; UN1193; POI; (0001, 0035, 0005) 2. Waste Chronic Acid Solutions; 3; UN1755; POI; (0007, 0002) 3. Waste Corrosive Liquid, Aqueous; 8; UN1791; POI; (0001, 0007) 4. Waste Corrosive Solid, Aqueous; (Nickel Acetate, Nickel Hydroxide); 9; UN3077; POI </td> </tr> </tbody> </table>												Haz. Code	Physical State	Specific Gravity	Percentage	Haz. Code	Physical State	Specific Gravity	Percentage	1. Waste Methyl Ethyl Ketone; 3; UN1193; POI; (0001, 0035, 0005) 2. Waste Chronic Acid Solutions; 3; UN1755; POI; (0007, 0002) 3. Waste Corrosive Liquid, Aqueous; 8; UN1791; POI; (0001, 0007) 4. Waste Corrosive Solid, Aqueous; (Nickel Acetate, Nickel Hydroxide); 9; UN3077; POI							
Haz. Code	Physical State	Specific Gravity	Percentage	Haz. Code	Physical State	Specific Gravity	Percentage																				
1. Waste Methyl Ethyl Ketone; 3; UN1193; POI; (0001, 0035, 0005) 2. Waste Chronic Acid Solutions; 3; UN1755; POI; (0007, 0002) 3. Waste Corrosive Liquid, Aqueous; 8; UN1791; POI; (0001, 0007) 4. Waste Corrosive Solid, Aqueous; (Nickel Acetate, Nickel Hydroxide); 9; UN3077; POI																											
15. Special Handling Instructions and Additional Information a) X44142 2 X55 0004127 b) X44073 8 X55 0004154 c) X44574 X55 0004154 d) X44598 X55 0004154																											
16. GENERATORS CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulation. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																											
Printed/Typed Name MELVIN L. POLLOCK						Signature <i>[Signature]</i>		Month Day Year 04/14/03																			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>		Month Day Year 04/14/03																			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>		Month Day Year 04/14/03																			
19. Discrepancy Indication Space																											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																											
Printed/Typed Name						Signature		Date Month Day Year																			

MDE 0989360